

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CASHMAN EQUIPMENT CORP.,

Plaintiff,

vs.

**EMCs CARIBBEAN LTD., CRAIG
NOBLETT, NERVIN WHEATLEY, and
ASHBURN HARRIGAN,**

Defendants.

Civil Action No. 1:21-cv-10862-RGS

APPLICATION FOR ENTRY OF DEFAULT

Plaintiff Cashman Equipment Corp. requests that the Clerk, pursuant to Fed. R. Civ. Pro. Rule 55(a), enter defaults against Defendants, EMCs Caribbean Ltd. (“EMCS”), Craig Noblett (“Noblett”), Nervin Wheatley (“Wheatley”), and Ashburn Harrigan (“Harrigan”).

Each defendant has been properly served with process in compliance with both the Federal Rules of Civil Procedure and The Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters (the “Hague Service Convention”). Proof of service has been demonstrated as follows:

- Per Rec. Doc. 7, EMCs Caribbean Ltd. was served with process on August 23, 2021 and its deadline to answer or otherwise respond was September 13, 2021.
- Per Rec. Doc. 10, Craig Noblett was personally served with process on September 14, 2021 and his deadline to answer or otherwise respond was October 5, 2021.
- Per Rec. Doc. 11, Ashburn Harrigan was personally served with process on September 14, 2021 and his deadline to answer or otherwise respond was October 5, 2021.

- Per Rec. Doc. 12, Nervin Wheatley was personally served with process on September 14, 2021 and his deadline to answer or otherwise respond was October 5, 2021.

More than 20 days has elapsed since service was accomplished on each of these Defendants and none of the Defendants has filed an answer to the Complaint or any other responsive pleading.

WHEREFORE, Plaintiff Cashman Equipment Corporation requests that the Clerk enter defaults against each Defendant into the record of this matter.

CASHMAN EQUIPMENT CORP.,
By its attorney,

/s/ Stephen W. Rider
Stephen W. Rider, Esq., BBO # 419820
Stephen W. Rider, P.C.
350 Lincoln Street – Suite 2400
Hingham, MA 02043
Tel: 781-740-1289
Fax: 781-207-9160
Email: stephen.rider@swrpc.com

Dated: September 14, 2021

CERTIFICATE OF SERVICE

I, Stephen W. Rider, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Stephen W. Rider.
Stephen W. Rider